

HEARST RANCHES

Est. 1865

November 28, 2016

Members, Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

SENT VIA E-MAIL - tammie.olson@waterboards.ca.gov

RE: Support for Changes to Arroyo de la Cruz Section 303(d) Listing (Resolution No. R3-2016-0053)

Dear Board Members:

I am writing on behalf of the Hearst Corporation to express support for proposed changes to the Draft California 2014 Integrated Report (303(d) List/305(b) Report which delineate the Arroyo de la Cruz lagoon as a waterbody separate and distinct from the remainder of the Arroyo de la Cruz watershed. These proposed changes are a component of Resolution No. R3-2016-0053 being considered as Agenda Item No. 16 at the December 9, 2016 meeting.

Arroyo de la Cruz (WBID# CAR3101201320020117141339) is presently listed on the Clean Water Act Section 303(d) list as impaired due to low dissolved oxygen and *E.coli*. The sampling which formed the basis of this listing was conducted within the lagoon immediately adjacent to Highway 1 and the Pacific Ocean. This lagoon is closed – not flowing to the ocean or receiving surface water from the watershed – for much of the year, and the physical, chemical and biological conditions of these lagoon areas are different from that of the upstream watershed. In the case of Arroyo de la Cruz, water quality parameters are also considerably different, justifying the proposed delineation of the lagoon as a waterbody separate from the watershed.

The Hearst Corporation has worked closely with Central Coast Regional Water Quality Control Board staff and others to measure and improve water quality in the Arroyo de la Cruz watershed. These management practices include the following:

- Over 7,000' of fencing has been installed to exclude cattle from the Arroyo de la Cruz drainage and lagoons during periods of streamflow. This fencing has been installed to maintain a 200'-800' buffer. Native species including deer and coyote, and non-native species including feral pigs and elk, maintain access to the creek at all times.
- Grazing within the riparian corridor – during periods without streamflow – is light, closely managed, and encourages willow and sycamore growth.
- Residual dry matter management, consistent with NRCS and UC Cooperative Extension guidelines, is employed to prevent erosion and siltation within the watershed.
- An ongoing and active infrastructure improvement program is employed whereby riparian fencing is installed and offstream water troughs, salt, and supplement are placed well away from the watershed.
- Since 2004 the Hearst Corporation has voluntarily engaged in a water quality testing program with testing done by Sage Associates.

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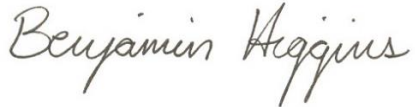
JACK RANCH
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Arroyo de la Cruz sampling locations are where streamflow enters the lagoon, and at the Green Canyon confluence several miles upstream from the lagoon. The dissolved oxygen and oxygen saturation mean results upstream from the top of the lagoon are 9.2 mg/l and 98%; and 9.1 mg/l and 95% downstream from the Green Canyon confluence. These averages are well above Regional Water Quality Control Board impairment thresholds of 7 mg/l and 85%. These results, as well as data and documentation collected by Central Coast Regional Water Quality Control Board staff, further justify the proposed delineation of the Arroyo de la Cruz lagoon as a separate waterbody segment from the watershed. There is no evidence that cattle grazing has been contributed to impaired water quality in the Arroyo de la Cruz lagoon.

Additionally, the 82,000-acre property surrounding the Arroyo de la Cruz watershed has been protected by a perpetual conservation easement since 2005, significantly limiting commercial development or intensified agricultural production which may impair water quality.

Again, the Hearst Corporation supports the proposed changes to the Draft California 2014 Integrated Report (303(d) List/305(b) Report which delineate the Arroyo de la Cruz lagoon as a waterbody separate and distinct from the remainder of the Arroyo de la Cruz watershed. We encourage your support of Resolution No. R3-2016-0053. Please do not hesitate to contact me should you have questions.

Sincerely,

A handwritten signature in cursive script that reads "Benjamin Higgins". The ink is dark and the signature is fluid.

Benjamin L. Higgins
Director of Agricultural Operations